

SUSMAN GODFREY

January 2, 2025

Hon. Ona T. Wang  
United States District Court  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, NY 10007

**RE: No. 20-cv-4322, *King v. Habib Bank Limited*, Plaintiffs' Letter Requesting Status Conference**

Dear Judge Wang,

Plaintiffs request a status conference at the Court's earliest convenience, whether in-person or telephonic. Plaintiffs wish to discuss the pending motions listed below, which have been fully briefed and will impact the issues discussed in Plaintiffs' opening expert reports. The fact discovery deadline is January 3, 2025, and the deadline for opening expert reports is January 31, 2025.<sup>1</sup>

1. Plaintiffs' Motion to Compel HBL to Produce Complete Transactional Data for True Positive Accounts (Dkts. 322, 342, 358)
2. Plaintiffs' Motion to Compel HBL to Produce Foreign Regulator Inspection Reports (Dkts. 324, 333, 338, 348, 355, 364)
3. Plaintiffs' Letter Brief Regarding Privilege Disputes (Submitted *In Camera* to Chambers on August 8, 2024 pursuant to the Court's July 31, 2024 Order at Dkt. 286)

Respectfully submitted,

/s/ Danielle Nicholson

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<sup>1</sup> As noted in the December 27, 2024 Joint Status Letter (Dkt. 375 at 4), Plaintiffs believe an extension of fact discovery is necessary to provide sufficient time to receive and review any transactional data, regulatory reports, and withheld documents that the Court orders for production.

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